

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS

SANTANA CLINE)
d.b.a The Dark Monkey) Case:
Plaintiff)
vs.) Judge:
vs.

ETSY INC, ELLIOT FISHER, BRAD
CAMPDEN, ALEX OLIYNYK,
JENNIFER MOUNTAIN, CAROLYN
DENTZ, JOHN DOE 1-1000 et.al)

Defendants)

)
)
)

COMPLAINT

2:15-cv-02115-JCM-VCF

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
NOV - 4 2015	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY: _____	DEPUTY

Plaintiff, SANTANA CLINE, doing business as The Dark Monkey, pro se, hereby sues Defendants ETSY INC, a New York corporation (“ETSY”), ELLIOT FISHER, BRAD CAMPDEN, ALEX OLIYNK, JENNIFER MOUNTAIN, CAROLYN DENTZ, John Doe's 1-1000 and allege:

NATURE OF ACTION, JURISDICTION AND VENUE

1. This is a civil action seeking damages and injunctive relief for copyright infringement under the copyright laws of the United States (17 U.S.C. 101 *et seq.*) and this is an action for trademark infringement, unfair competition and passing off under the Lanham Act, 15 U.S.C.

1114 and 1125(a), relating to the unlawful appropriation of registered and common law trademarks and copyrights of “Merry Christmas Ya Filthy Animal” belonging to Santana Cline d.b.a The Dark Monkey.

2. The Court has jurisdiction under 17 U.S.C 101 et seq; 28 U.S.C 1331 (federal question) and 28 U.S.C 1338(a) (copyright infringement).

3. Venue is proper in the District of Nevada pursuant to 28 U.S.C 1391(b) because a substantial part of events giving rise to the claim occurred in this District due to the registration and business of the Plaintiff being located in the District.

PARTIES

4. Plaintiff SANTANA CLINE d.b.a THE DARK MONKEY (“CLINE”) is a business owner in Las Vegas, Nevada, *NV20151539461*. As detailed below, CLINE designs and sells products and first used “Merry Christmas Ya Filthy Animal” on products more than half a decade ago, including shirts and decals.

5. Defendant ETSY INC (“ETSY”) is a New York corporation whose primary business is hosting and selling products.

6. Defendant ELLIOT FISHER is believed to be a citizen and resident of Ohio.

7. Defendant BRAD CAMPEN is believed to be a citizen and resident of Florida

8. Defendant ALEX OLIYNYK is believed to be a citizen and resident of New York

9. Defendant JENNIFER MOUNTAIN is believed to be a citizen and resident of Arkansas

10. Defendant CAROLYN DENTZ is believed to be a citizen and resident of Washington,

DC.

11. Defendants JOHN DOE'S 1-1000 are inserted for other participants of Etsy and others unknown to the Plaintiff attempting to sell and assert unlawful rights to their copyrights and trademarks.

MERRY CHRISTMAS YA FILTHY ANIMAL

TRADEMARKS AND COPYRIGHTS

12. Established in 2010, Santana Cline d.b.a The Dark Monkey have designed and sold various products that have been featured in numerous online and print publications, including Buzzfeed, Gizmodo, TUAW, Holiday Gift Guides, Vogue Online, amongst others. CLINE actively offers various products and other merchandise using registered and common law copyright and trademarks belonging to CLINE.

13. In connection with the activities and products described in the foregoing complaint, CLINE is the owner, among others, the following federally registered trademarks and copyrights:

14. "**MERRY CHRISTMAS YA FILTHY ANIMAL**" as a Federally registered copyright with specific visual media designs was registered under VA0001941833 on November 17th, 2014 with an original publication date of November 1st, 2010.

15. "**MERRY CHRISTMA YA FILTHY ANIMAL**" as a Federally registered trademark

with the USPTO under Serial Number 86805363 on October 30th, 2015 under International Class 040: Custom imprinting of clothing with decorative designs with first usage in commerce on November 1st, 2010.

16. Copies of the certificates of filing and registration for each of these copyrights and trademarks are attached to this complaint.

17. The certificates of registration in the preceding paragraph are valid and subsisting and CLINE has record title in the marks described above.

18. The certificate of registration are prima facie evidence of the validity of the registered copyrights and trademarks, CLINE's ownership of the marks, and CLINE's exclusive right to the use of the registered marks in connection with the goods and services specified in the certificates of registration enumerated above.

19. CLINE has used the registered trademarks, common law trademarks and copyrights described above continuously and exclusively for identification with CLINE and THE DARK MONKEY brand.

20. CLINE currently is the only manufacturer and licensee over their products. The goods and services bearing its marks and trade dress are associated only with CLINE and her company, THE DARK MONKEY. The quality of goods and value are measured and marketed

only by CLINE.

21. Defendants are not licensed and have not been licensed by CLINE for any products or services. Defendants infringing acts include, but are not limited to, promoting and willfully disregarding DMCA and IP trademark claims, creating, manufacturing, producing, selling, marketing and distributing “MERRY CHRISTMAS YA FILTHY ANIMAL” products which amounts to unlawful appropriation of Copyrighted and Trademarked material.

**DEFENDANTS INFRINGING USE OF CLINE'S
TRADEMARKS AND COPYRIGHTS**

22. Defendant ETSY are in the business of operating online and offline marketplaces to buy and sell allegedly handmade items, vintage goods, and craft supplies. Its platform purports to connect sellers and buyers to buy and sell items for the home, art, jewelry, clothing and other various products.

23. The Company, which was founded in 2005, claims to have a legal department that maintains and removes infringing material from their venue. At this time, ETSY has been contacted more than a dozen times for copyright and trademark issues relating to various sellers continued unlawful usage of “MERRY CHRISTMAS YA FILTHY ANIMAL” designs and copyrights on clothing sold on their venue. ETSY has rejected trademark claims despite serial registration and common law rights despite being provided with proof of registration and usage in commerce for more than half a decade. Therefore ETSY is willfully and

unlawfully profiting through ETSY fees and other various products, including their Direct Checkout, by allowing sellers to willfully violate the copyrights and trademarks belonging to CLINE.

24. Defendant ELLIOT FISHER operates multiple stores on and off ETSY, including *YaFilthyAnimal* and *TeesToYou*, and knowingly and willfully infringes upon the copyright and trademarks of “MERRY CHRISTMAS YA FILTHY ANIMAL” by selling various clothing products bearing the marks registered to CLINE. The shop sells the same products with what appears to be infringements on numerous other companies marks, most notably those belonging to Disney and Marvel. Thus, their conduct is knowingly and willful after disregarding numerous DMCA and infringement claims.

25. Defendant BRAD CAMPDEN operates an ETSY shop known as *TshirtMarket* and knowingly and willfully infringes upon the copyright and trademarks of “MERRY CHRISTMAS YA FILTHY ANIMAL” by selling various clothing products bearing the marks registered to CLINE.

26. Defendant ALEX OLIYNYK operates an ETSY shop known as *CuteBuffy* and knowingly willfully infringes upon the copyright and trademarks of “MERRY CHRISTMAS YA FILTHY ANIMAL” by selling various clothing products bearing the marks registered to CLINE. Defendant also attempted to register a similar mark of “MERRY CHRISTMAS YA FILTHY ANIMAL” as well as “MERRY CHRISTMAS YA FILTHY MUGGLE” in which

Warner Bros. owns the rights to the word “Muggle” and is currently engaged with Plaintiff in disputing Defendants fraudulent claims to the marks.

27. Defendant JENNIFER MOUNTAIN operates an ETSY shop known as *HolidayApparel* and knowingly and willfully infringes upon the copyright and trademarks of “MERRY CHRISTMAS YA FILTHY ANIMAL” by selling various clothing products bearing the marks registered to CLINE.

28. Defendant CAROLYN DENTZ operates an ETSY shop known as *DentzDenim* and knowingly and willfully infringes upon the copyright and trademarks of “MERRY CHRISTMAS YA FILTHY ANIMAL” by selling various clothing products bearing the marks registered to CLINE.

29. Defendants JOHN DOE'S 1-1000 are other unknown sellers who are unlawfully using the designs and marks for financial gain and will be substituted in the action once known to the Plaintiff.

30. Upon information and belief, Defendants have exploited the phrase and design “MERRY CHRISTMAS YA FILTHY ANIMAL” in this District and throughout the United States and throughout the world by unlawfully reproducing, preparing derivative works, distributing, licensing and publicly selling products of “MERRY CHRISTMAS YA FILTHY ANIMAL” on clothing and other media to others for made to order profits.

31. The infringement is continuing as “MERRY CHRISTMAS YA FILTHY ANIMAL” continues to be unlawfully sold for use in various configurations to this very day.

32. Defendants were placed on notice of the infringement but have continued infringing.

33. As a result of Defendants' acts, Plaintiff has incurred and will continue to incur significant damages. Defendants unauthorized exploitation of “MERRY CHRISTMAS YA FILTHY ANIMAL” by the infringing works and any derivatives thereof, is in derogation of, and injurious to, Plaintiff's rights as owner of the copyrights and trademarks and to Plaintiff's substantial damage.

34. All conditions precedent to the bringing of this action have been satisfied, have occurred or have been waived.

COUNT ONE

INFRINGEMENT OF REGISTERED TRADEMARKS UNDER 15 U.S.C 1114

CLINE incorporates the allegations contained in the complaint as if fully restated herein.

The commercial use of CLINE's trademarks on t-shirts and other merchandise by Defendants is a willful infringement of the registered “MERRY CHRISTMAS YA FILTHY ANIMAL” trademarks and such commercial use was with the knowledge of and intended to trade off

CLINE'S rights.

Defendants' production and/or sale of the infringing merchandise that uses the trademarks creates a likelihood of confusion.

Defendants' use of CLINE's trademarks will continue unless enjoined by this Court.

CLINE is entitled to a permanent injunction against Defendants, as well as all other remedies available under the Lanham Act, including but not limited to, compensatory damages, treble damages, disgorgement of profits and costs.

COUNT TWO

UNFAIR COMPETITION AND PASSING OFF UNDER 15 U.S.C 1125(a)

CLINE incorporates the allegations contained in the complaint as if fully restated herein.

Defendants' production and sale of merchandise bearing the "MERRY CHRISTMAS YA FILTHY ANIMAL" trademarks on merchandise that competes directly with licensed and legal apparel products, will likely cause confusion, mistake or deception on the part of the persons interested in purchasing holiday "MERRY CHRISTMAS YA FILTHY ANIMAL" apparel as to the origin, sponsorship or approval of CLINE, in violation of 15 U.S.C 1125(a)

Upon information and belief, Defendants' unfair competition and passing off has been willful and deliberate, designed specifically to trade upon consumer goodwill created and enjoyed by CLINE for Defendants' profit.

Defendants' use of CLINE's trademarks will continue unless enjoined by this Court.

CLINE is entitled to a permanent injunction against Defendants, as well as all other remedies available under the Lanham Act, including but not limited to, compensatory damages, treble damages, disgorgement of profits and costs.

COUNT THREE

COPYRIGHT INFRINGEMENT

CLINE incorporates the allegations contained in the complaint as if fully restated herein.

Plaintiff is, and at all relevant times have been, copyright owners under United States copyright law with respect to "MERRY CHRISTMAS YA FILTHY ANIMAL" and its design, which is the subject of a valid Certificate of Copyright Registration issued by the Register of Copyrights.

Among the exclusive rights granted to Plaintiff under the Copyright Act are the exclusive rights to reproduce and distribute the copyrighted materials to the public and prepare

derivative works.

Defendants, without the permission or consent of Plaintiffs, have reproduced and distributed Plaintiff's Copyrighted Material to the public. Defendants have no license or any other form of permission to use, copy, reproduce, distribute or create derivative works of "MERRY CHRISTMAS YA FILTHY ANIMAL". By copying, distributing, creating derivative works of "MERRY CHRISTMAS YA FILTHY ANIMAL", Defendants have infringed Plaintiff's exclusive rights. Defendant's action constitute infringement of Plaintiff's copyright and exclusive rights under copyright.

Plaintiffs are informed and believe that the foregoing acts of infringement have been willful and intentional, in utter disregard of and with indifference to the rights of Plaintiffs.

Defendants have profited substantially from their infringing activities, have collected, and continue to collect, profits and fees from the sale of the infringing work or any derivatives thereof, and have retained a portion of those fees and profits without submitting any amount to Plaintiffs. Defendants should be held jointly and severally liable for all profits derived as a result of their infringing activities as practical partners.

As a result of Defendants' willful infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to maximum statutory damages pursuant to 17 U.S.C. §

504(c) or to recover their actual damages and profits attributable to the infringement pursuant to 17 U.S.C. § 504(b), at Plaintiffs' election, and such other relief as is provided by law.

The conduct of Defendants is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot fully be compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiffs are entitled to injunctive relief prohibiting Defendants from further infringing Plaintiffs' copyrights, and ordering Defendants to destroy all copies of the infringing work and/or other material made in violation of Plaintiffs' exclusive rights.

WHEREFORE, Santana Cline requests that the Court Order:

1. The issuance of a permanent injunction enjoining Defendants and their agents, servants, employees, successors, representatives and assigns and all others in concert and privity with them from infringing, falsely designating the origin of CLINE's trademarks and copyrights and from passing off Defendants' products using such marks in commerce in any way, from injuring Cline and otherwise violating the law and rights assigned to CLINE.
2. That Defendants account to CLINE for their profits, the actual damages suffered by CLINE as result of Defendants acts of trademark infringement, unfair competition and passing off their marks, together with interest and costs, and that such damages be trebled because of

the willful acts described above, which acts were committed in knowing disregard of CLINE'S known rights. Also require Defendants to pay, jointly and severally, maximum statutory damages for each infringement of the Copyrighted Material pursuant to 17 U.S.C. Section 504(c) or to pay Plaintiffs' actual damages and profits attributable to the infringement pursuant to 17 U.S.C. Section 504(b) and such further damages as permitted by applicable law.

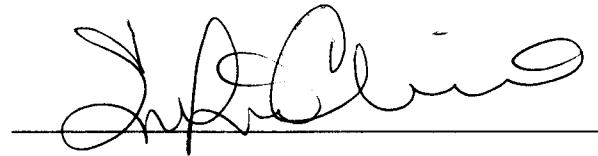
3. That Defendants surrender all merchandise that bears any CLINE copyrights and trademarks for destruction
4. That Defendants pay compensatory and treble damages to CLINE
5. That Defendants disgorge all profits realized from the sale of merchandise that bears any of CLINE'S trademarks and copyrights.
6. That Defendants pay CLINE's cost of this suit
7. All other and further relief as may be just and equitable

DEMAND FOR JURY TRIAL

Plaintiff demand trial by jury on all issues so triable.

Respectfully Submitted,

Dated: November 3rd, 2015



Santana Cline
8243 Chippenham Drive
Dublin, Ohio 43016
614-339-4409
Pro Se

Copyright

United States Copyright Office

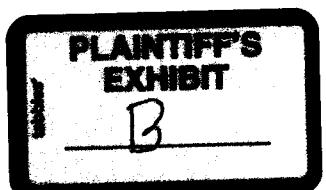
[Help](#) [Search](#) [History](#) [Titles](#) [Start Over](#)**Public Catalog**

Copyright Catalog (1978 to present)

Search Request: Left Anchored Name = cline santana

Search Results: Displaying 1 of 1 entries

 [previous](#) [next](#) *Merry Christmas Ya Filthy Animal.***Type of Work:** Visual Material**Registration Number / Date:** VA0001941833 / 2014-11-17**Application Title:** Merry Christmas Ya Filthy Animal.**Title:** Merry Christmas Ya Filthy Animal.**Description:** Electronic file (eService)**Copyright Claimant:** Santana Cline, 1985- . Address: 6170 W. Lake Mead Blvd, #46185, Las Vegas, NV, 89108, United States.**Date of Creation:** 2010**Date of Publication:** 2010-11-01**Nation of First Publication:** United States**Authorship on Application:** Santana Cline, 1985- ; Citizenship: United States. Authorship: 2-D artwork.**Rights and Permissions:** The Dark Monkey, 6170 W. Lake Mead Blvd, #46185, Las Vegas, NV, 89108, United States**Names:** Cline, Santana, 1985- [previous](#) [next](#) **Save, Print and Email (Help Page)**Select Download Format Full Record Format for Print/SaveEnter your email address: [Email](#)[Help](#) [Search](#) [History](#) [Titles](#) [Start Over](#)
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Trademark Electronic Application System (TEAS) filing receipt

1. **YOUR MARK:** MERRY CHRISTMAS YA FILTHY ANIMAL (Standard Characters, mark.jpg)
The literal element of the mark consists of MERRY CHRISTMAS YA FILTHY ANIMAL. The mark consists of standard characters, without claim to any particular font, style, size, or color.
2. **YOUR SERIAL NUMBER:** We have received your U.S. Trademark Application and assigned serial number '86805363' to your submission. A summary of your application data is provided at the bottom of this message and serves as your official filing receipt. Please keep a copy of this information for your records. All correspondence concerning the application should reference your assigned serial number.
3. **RECEIVING E-MAIL COMMUNICATIONS/FILING DOCUMENTS ON-LINE:** Because you have authorized receipt of correspondence by e-mail, please make sure that your server will accept USPTO e-mail and not treat it as SPAM. If you must submit correspondence to us, please use the Trademark Electronic Application System (TEAS) forms, available at <http://www.uspto.gov/trademarks/teas/index.jsp>. Applicants who filed their application online using the TEAS Plus application form must (1) continue to submit certain documents online using TEAS, including responses to Office actions (see http://www.uspto.gov/trademarks/teas/required_teas_filings.jsp for a complete list of these documents); (2) accept correspondence from the USPTO via e-mail throughout the examination process; and (3) maintain a valid e-mail address. TEAS Plus applicants who do not meet these three requirements must submit an additional processing fee of \$50 per international class of goods/services. However, in certain situations, authorizing an examiner's amendment by telephone will not incur this additional fee.
4. **KEEP YOUR ADDRESS CURRENT IN USPTO RECORDS:** We do not extend filing deadlines due to a failure to receive USPTO mailings/e-mailings. You must update the correspondence and/or owner's address if a postal address and/or e-mail address changes, using the form(s) available at <http://www.uspto.gov/trademarks/teas/correspondence.jsp>.
5. **WARNING ABOUT UNSOLICITED COMMUNICATIONS:** You may receive trademark-related communications from private companies not associated with the USPTO. These communications frequently display customer-specific information, including your USPTO serial number or registration number and owner name, and request fees for trademark-related services, such as monitoring, listings in international publications, and document filing. None of the companies offering these services are affiliated with the USPTO or any other federal agency. All official correspondence will be from the "United States Patent and Trademark Office" in



Alexandria, VA, and if by e-mail, specifically from the domain "@uspto.gov." Please consult the "Warning" page on the Trademarks section of the USPTO's website for further information about unsolicited communications and to view representative examples of them. For general information on filing and maintenance requirements for trademark applications and registrations, including fees required by law, please consult www.uspto.gov, contact the TrademarkAssistanceCenter@uspto.gov or telephone 1-800-786-9199.

6. **LEGAL EXAMINATION PROCESS:** Your application is now pending examination. In approximately 3 months, your application will be assigned to a USPTO examining attorney for review. The application cannot mature into a registration unless all legal requirements are met, and many applications never satisfy these requirements and therefore never register. The overall process can take up to 18 months.
7. **CHECK STATUS AND REVIEW DOCUMENTS OR YOUR APPLICATION MAY BE UNINTENTIONALLY ABANDONED:** You must check the status and review all documents associated with your application at least every 3-4 months using Trademark Status and Document Retrieval (TSDR), available at <http://tsdr.uspto.gov/>.

Promptly e-mail the TrademarkAssistanceCenter@uspto.gov or telephone 1-800-786-9199 (select option #1) if an Office action (letter from the USPTO) or notice has issued for your application that you did not receive or do not understand. Failure to respond timely to any Office action or notice may result in the abandonment of your application, requiring you to pay an additional fee to have your application revived even if you did not receive the Office action or notice.

8. **FILING ERRORS:** If you discover an error in the application data, you must file a Voluntary Amendment at <http://www.uspto.gov/trademarks/teas/miscellaneous.jsp>. Do not submit any proposed amendment to TEAS@uspto.gov, because the TEAS technical support team may not make any data changes. Please wait approximately 7 days after the filing date of your application to submit a Voluntary Amendment in order to allow for initial upload of your application data into the USPTO database. The assigned examining attorney will determine the acceptability of any Voluntary Amendment during examination. Not all errors may be corrected. For example, if you submitted the wrong mark or if the proposed correction would be considered a material alteration to your original filing, it will not be accepted. In this situation, your only recourse would be to file a new application, with a new fee and no refund of your original filing fee.
9. **REQUEST FOR REFUND AND/OR CANCELLATION:** Since your application has already been assigned a serial number, please do not contact TEAS@uspto.gov to request a refund or to cancel the filing. We will only cancel the filing and refund the filing fee if the application does not meet minimum filing requirements. The fee is a processing fee that the USPTO does not refund, even if your mark does not proceed to registration.

In the limited situation where you inadvertently filed identical applications, one immediately after the other, because no confirmation of the first filing was received, please provide both serial numbers to the technical support team at TEAS@uspto.gov.

10. **SelectUSA:** The United States represents the largest, most dynamic marketplace in the world and is an unparalleled location for business investment, innovation, and commercialization of new technologies. The U.S. offers tremendous resources and advantages for those who invest and manufacture goods here. Through SelectUSA, our nation works to promote and facilitate

business investment. SelectUSA provides information assistance to the international investor community; serves as an ombudsman for existing and potential investors; advocates on behalf of U.S. cities, states, and regions competing for global investment; and counsels U.S. economic development organizations on investment attraction best practices. To learn more about why the United States is the best country in the world to develop technology, manufacture products, deliver services, and grow your business, visit SelectUSA.gov or call +1-202-482-6800.

SUMMARY OF APPLICATION DATA FOLLOWS:

APPLICATION DATA: You have filed a **Trademark/Service Mark Application** for registration on the **Principal Register** using a **TEAS Plus** application form.

The applicant, Cline, Santana Jade, a limited liability company legally organized under the laws of Nevada, having an address of

6170 W. Lake Mead Blvd #46185
Las Vegas, Nevada 89108
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 040: Custom imprinting of clothing with decorative designs

Use in Commerce: The applicant is using the mark in commerce on or in connection with the identified goods/services. The applicant attaches, or will later submit, one specimen as a JPG/PDF image file showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, regardless of whether the mark itself is in the standard character format or is a stylized or design mark. The specimen image file may be in color, and the image must be in color if color is being claimed as a feature of the mark.

In International Class 040, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 11/01/2010, and first used in commerce at least as early as 11/01/2010, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, consisting of a(n) Flyer for product Employee Shirt.

Specimen-1 [SPE0-50423541-20151030172120158773_.MerryChristmas.jpg]

Specimen-2 [SPE0-50423541-

20151030172120158773_.MerryChristmasYouFilthyAnimalGreenTeeShirt.jpg]

The applicant's current Correspondence Information:

Cline, Santana Jade

Cline, Santana Jade

6170 W. Lake Mead Blvd #46185

Las Vegas, Nevada 89108

merrychristmasteses@gmail.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or applicant's attorney at the e-mail address provided above. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in an additional processing fee of \$50 per international class of goods/services.

A fee payment in the amount of \$225 has been submitted with the application, representing payment for 1 class(es).

Declaration

The signatory believes that: if the applicant is filing the application under 15 U.S.C. § 1051(a), the applicant is the owner of the trademark/service mark sought to be registered; the applicant is using the mark in commerce on or in connection with the goods/services in the application; the specimen(s) shows the mark as used on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e), the applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Santana Cline/ Date: 10/30/2015

Signatory's Name: Santana Cline

Signatory's Position: Owner

Signatory's Phone Number: 6142843842

Thank you,

The TEAS support team

Fri Oct 30 17:37:22 EDT 2015

STAMP: USPTO/FTK-50.4.235.41-20151030173721959923-86805363-

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